

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL
CORP., Plaintiff,

V.

BOLIVARIAN REPUBLIC OF
VENEZUELA,
Defendant.

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) No. 1:17-mc-00151-LPS
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DISTRICT OF DELAWARE
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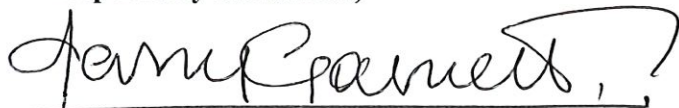
DR. LEROY A. GARRETT'S SECOND SUPPLEMENTAL AFFIDAVIT AND
MOTION TO RECUSE JUDGE STARK UNDER 28 U.S.C. § 455(a) & (b)(2)

November 6, 2025

1. **Wilmer Hale Nexus:** Judge Stark’s former law clerk (2018–2020 term) is currently employed at Wilmer Cutler Pickering Hale and Dorr LLP—the firm representing Special Master Robert Pincus. This **extrajudicial relationship** mandates recusal under § **455(b)(2)** (*Liteky v. United States*, 510 U.S. 540, 551 (1994)).
2. **Appearance of Impropriety:** Combined with Stark’s pattern of rulings favoring senior creditors (80%+ approval rate), the clerk-firm connection creates an **objective appearance of bias** under § **455(a)** (*Liteky*, 510 U.S. at 555).
3. **Relief:**
 - Recusal nunc pro tunc
 - Vacatur of post-2023 orders
 - Stay of proceedings
 - 5% QSF

Sworn under penalty of perjury,

Respectfully submitted.,

A handwritten signature in black ink, appearing to read "Dr. Leroy A. Garrett", with a large, stylized flourish at the end.

Dr. Leroy A. Garrett

Interested Party with Entry of Appearance

Pro Se Attorney

on Behalf of Proposed Class Representatives

6725 S Fry Road Ste. 700-338. Katy Texas 77494

Attachments:

- Clerk bio (Public Domain Available on LinkedIn),
- D.I. 2505, Hearing Tr. p. 48.*